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6 DISTRICT COURT OF GUAM
7 TERRITORY OF GUAM
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9 SHANNON H. SELEEN,
10 Plaintiff,

11 vs.

12 DEPARTMENT OF EDUCATION,
13 Defendant.
14

CIVIL CASE NO. 09-00010

**ORDER and
NOTICE OF RECEIPT OF EMAILS
AND FACSIMILES**

15 In the interest of full and complete disclosure, the court issues the following Order and
16 notice.

17 On September 15, 2009, the court issued an Order to Show Cause and directed the
18 Plaintiff to file her response no later than October 16, 2009.

19 On September 16, 2009, the law clerk to the below-signed judge received an email from
20 the Plaintiff's counsel containing two attachments. *See* Attachment 1 hereto. The two email
21 attachments consisted of a Relocation Letter and a Proposed Scheduling Order and Discovery
22 Plan. Counsel also telephoned my law clerk that morning and was advised that the court had
23 issued an Order to Show Cause in the case, a copy of which was electronically served upon him
24 via email. No further discussion occurred.

25 Later that evening, at approximately 9:23 p.m., the Plaintiff's counsel sent a second
26 email with one attachment to the below-signed judge's law clerk. *See* Attachment 2 hereto.
27 The email attachment purported to be counsel's response to the Order to Show Cause.

28 The following day, on September 17, 2009, the court received a facsimile, appended

hereto as Attachment 3, from the Plaintiff's counsel. The facsimile contained a different version of what appeared to be counsel's response to the Order to Show Cause.

On September 18, 2009, another facsimile was received by the court from the Plaintiff's counsel. The facsimile included what appears to be the Plaintiff's reply to the Motion to Dismiss filed by the Defendant.

Pursuant to Rule GR 5.1 of the Local Rules of Practice for the District Court of Guam, only papers containing an original signature shall be accepted for filing. "No facsimile filings shall be accepted as the original for filing unless the party seeking to file by facsimile has secured the permission of the Court to file by facsimile by motion to the Court." Local Rule 5.1(a). In this case, the Plaintiff's counsel never sought permission from the court to file his documents via facsimile, email or other electronic means. Thus, none of the pleadings faxed or emailed (and appended hereto) may be considered as having been officially filed with the court until approval for such filing has been sought and granted by the court. If counsel's goal was to file said pleadings electronically, then counsel should have consulted the court's Administrative Procedures for the Electronic Filing, Signing, Verifying, and Serving of Civil and Criminal Documents, which is available on the court's website. Counsel has not been authorized to file pleadings electronically because he has not satisfactorily completed the necessary training program as a qualification for issuance of a password for use in the court's "live" database.

Accordingly, no pleading shall be deemed "filed" until the original hard copy is received for filing at the Clerk's Office, unless the Plaintiff's counsel receives authorization to file pleadings electronically or the court has granted a motion to permit the filing of documents via facsimile or other means. The court admonishes counsel to refrain from further *ex parte* communications with the court. Future violations may result in the imposition of appropriate sanctions.

IT IS SO ORDERED.



/s/ **Joaquin V.E. Manibusan, Jr.**
U.S. Magistrate Judge
Dated: Sep 18, 2009



Dear Judith:

There is a Scheduling conference scheduled for Thursday at 10:30 am. I have submitted the proposed scheduling order to the Guam AG's office for their approval and signature. Attached is a copy for your information.

Ron Moroni said he would be glad to cover the Scheduling Conference for me but I believe it is Judge Manibusan's requirement that he be in for a pound if he is in for a penny. So I will call you this morning to see about doing it by teleconference.

Attached also is the letter I originally sent out in late July/early August regarding my change of address starting in late August. Hawaii Telecom finally got my telephone/internet connected the end of last week. Please pass the updated information on the Clerk's Office. I will send them a letter also.

The updated information is:

Mailing Address:

PO Box 2794, Wailuku, HI 96793

Home Phone: (808) 572-9473

Cell: (808) 269-4653

Thanks,

Lewis Littlepage

This e-mail and any attachments contain information from the law firm of Littlepage & Associates, P.C. and are intended solely for the use of the named recipients or recipients. This e-mail may contain privileged attorney/client communications or work product. Any dissemination of this e-mail by anyone other than an intended recipient is strictly prohibited. If you are not the named recipient, you are prohibited from any further viewing of the e-mail or any attachments or from making any use of the e-mail or attachments. If you believe you have received this e-mail in error, notify the sender immediately and permanently delete the e-mail, any attachments, and all copies thereof from any drives or storage media and destroy any printouts of the e-mails or attachments.



Relocation Letter.doc Scheduling Order and Discovery Plan.doc

ATTACHMENT 1

LITTLEPAGE & ASSOCIATES, P.C.

396 W. O'Brien Drive
Chode Building
Hagåtña, Guam 96910

TELEPHONE: (671) 475-1111
TELECOPIER: (671) 475-1112
E-mail address: lewis@littlepagelawfirm.com

July 29, 2009

TO: JUSTICES, Supreme Court of Guam
JUDGES, Superior Court of Guam
CHIEF JUDGE, District Court of Guam
CLERK OF COURT, Supreme Court of Guam
CLERK OF COURT, Superior Court of Guam
CLERK OF COURT, District Court of Guam
ALL PRACTICING ATTORNEYS
Office of the Attorney General of Guam
Public Defender Service Corporation
Alternate Public Defender

RE: **Notice of Office Closing**

Please be advised that I have accepted a position at the Maui Prosecutor's Office and am closing my office as of August 14, 2009. From August 14, 2009 through August 25th, 2009 you may reach me at (671) 689-2310 or (671) 689-4939. Service may be arranged for any cases of which I am still counsel of record by telephoning me at one of the above numbers.

If any attorney is interested in leasing the office at 396 W. O'Brien Drive, inquiries can be made through this office.

After August 25th, I can be reached at the following address:

Lewis W. Littlepage
P.O. Box 2794
Wailuku, HI 96793-7794
E-Mail: guamlawyer@yahoo.com or lewis@littlepagelawfirm.com

Hawaii telephone and fax numbers will be provided as soon as available.
Thank you for your courtesy in this regard.

Sincerely,

Lewis W. Littlepage

Lewis Ward Littlepage
LITTLEPAGE & ASSOCIATES, P.C.
396 W. O'Brien Drive
Chode Building
Hagatna, Guam 96910
Tel: (671) 475-1111
Fax: (671) 475-1112
E-Mail: lewis@littlepagelawfirm.com
Attorney for Ms. Shannon H. Seleen

**UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

SHANNON H. SELEEN,)	Civil Case No. 09-00010
)	
Plaintiff,)	(PROPOSED)
)	
vs.)	
)	SCHEDULING ORDER AND
GUAM PUBLIC SCHOOL SYSTEM,)	DISCOVERY PLAN
GOVERNMENT OF GUAM,)	
)	
Defendant.)	

Pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure, and Local Rule 16.1 for the District Court of Guam, the parties hereby submit the following Scheduling Order and Discovery Plan:

1. **Nature of the Case.** Plaintiff is suing the Guam Public School System for violation of Title VII of the Civil

~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam  
Civil Case 09-00010  
Proposed Scheduling Order

1 Rights ct of 1964 and the Civil Rights Act of 1961, for  
2 employment discrimination. Ms. Seleen also seeks to  
3 enforce Section 504 of the Rehabilitation Act of 1973,  
4 Public Law 93-112 Section 504, 29 U.S.C. § 794.

5  
6 **2. Posture of the Case.**

7 (a) Plaintiff has filed a Motion to Dismiss.

8 (b) The following motions have been resolved: **None to**  
9 **date.**

10 (c) The following discovery has been initiated: None  
11

12 **3. Motions to Amend.** All motions to amend the pleadings  
13 shall be filed on or before **Friday, October 30, 2009.**  
14

15 **4. Motions to Add Parties:** All motions to add parties  
16 shall be filed on or before **Friday, October 30, 2009.**  
17

18 **5. Discovery Plan.** The following is the description and  
19 schedule of all pretrial discovery each party intends to  
20 initiate prior to the close of discovery:  
21

22 (a). **Initial Disclosures:** The times for disclosures under  
23 Rules 26(a) and 26(e) of the Federal Rules of Civil procedure  
24 are modified as follows:

25 26(a)(1) - within 30 days from the date of this order.  
26

27 (b). **Depositions:** Depositions are still to be scheduled.  
28

~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam
Civil Case 09-00010
Proposed Scheduling Order

1
2 (c). **Written Discovery:** Each party may propound
3 interrogatories and requests to produce and requests for
4 admissions within the limits set by the Federal Rules of
5 Civil Procedure. If either party determines that it needs
6 to propound more discovery than permitted by the Rules, the
7 parties will confer in good faith to accommodate reasonable
8 discovery requests prior to the filing of any motion
9 relating to a discovery dispute.
10

11 (d). **Discovery Cutoff.** The discovery cutoff date (defined
12 as the last date to file responses to discovery) shall be
13 **Friday April 30, 2010.**
14

15 (e). **Expert Discovery:**

16 1. The disclosures of expert testimony required under
17 Federal Rule of Civil Procedure 26(a)(2) shall be made
18 by Plaintiff not later than **Friday, October 30, 2009.**
19

20 2. The disclosures of expert testimony required under
21 Federal Rule of Civil Procedure 26(a)(2) shall be made
22 by Defendant not later than **Friday, November 27, 2009.**
23

24 3. Any designation of rebuttal expert testimony under
25 Rule 26(a)(2) shall be made no later than **Friday,**
26 **January 15, 2010.**
27
28

1 4. The depositions of experts may be scheduled at any
2 time at least 20 days subsequent to the submission of
3 rebuttal reports and the depositions of said experts
4 shall be completed no later than **Friday, February 26,**
5 **2010.**

6
7 6. **Motions.**

8 (a) The anticipated discovery motions are: **None are**
9 **anticipated at this time.**

10 All discovery motions shall be filed on or before **Friday,**
11 **March 26, 2010.**

12
13 (b) The anticipated dispositive motions are: **Unknown at**
14 **this time.**

15 All dispositive motions shall be filed on or before **Friday**
16 **April 16, 2010.**

17
18 7. **Settlement.** The prospects for settlement are unknown.

19
20 8. **Preliminary Pretrial Conference.** The preliminary
21 pretrial conference shall be held on **Monday, May 10, 2010 at**
22 _____ **a.m.**

23
24 9. **Pretrial Filings.** The parties' pretrial materials,
25 discovery materials, witness lists, exhibit lists, and
26 designation of discovery responses shall be filed on or before
27 **Monday, May 24, 2010.**

28
~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam  
Civil Case 09-00010  
Proposed Scheduling Order



1  
2       10. **Pretrial Order.**    The proposed pretrial order shall be  
3 filed on or before **Monday, May 24, 2010.**

4  
5       11. **Final Pretrial Conference.**    The final pretrial  
6 conference shall be held on **Monday, June 7, 2010 at \_\_\_\_\_ a.m.**

7  
8       12. **Trial.**    Trial shall commence on **Monday, June 14, 2010**  
9 **at \_\_\_\_\_ a.m.**

10  
11       13. **Jury.**    This is a Jury Trial.

12  
13       14. **Anticipated Trial Time.**    It is anticipated that it  
14 will take approximately 4 to 5 days to try this case.

15  
16       15. **Identity of Counsel.**    The counsel involved in this  
17 case are:

18               Lewis W. Littlepage  
19               P.O. Box 2794  
20               Wailuku, HI 96793  
                 (808) 572-9473

21               David Highsmith - Assistant Attorney General for the  
22               U.S. Territory of Guam.  
23               Guam Attorney General's Office  
24               287 W. O'Brien Drive  
                 Hagatna, GU 96910

25       16. **Settlement Conference:** The parties do wish to submit  
26 this case to a settlement conference.

27  
28  
~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam
Civil Case 09-00010
Proposed Scheduling Order

1 17. Suggestions for Shortening Trial. The parties will
2 explore stipulations as to undisputed facts.
3

4
5 18. Case Management Issues:
6

7 DATED this _____ day of September, 2009.
8
9
10
11

12 JOAQUIN V. E. MANIBUSAN, JR.
13 U.S. MAGISTRATE JUDGE
14
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~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam  
Civil Case 09-00010  
Proposed Scheduling Order

1 APPROVED AS TO FORM AND CONTENT  
2  
3  
4

5 \_\_\_\_\_  
6 Lewis W. Littlepage, Esq.  
7 Attorney for Plaintiff

\_\_\_\_\_ David Highsmith, Esq.  
Assistant Attorney General  
U.S. Territory of Guam

8 Date: 9/13/2009

Date: 9/14/2009

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~~~~~  
Shannon H. Seleen vs. Guam Public School System, Government of Guam
Civil Case 09-00010
Proposed Scheduling Order



Re: Civil 09-00010, Seleen v. GPSS
Lewis Littlepage to: Francine_Diaz, Judith Hattori

09/16/2009 09:23 PM

History:

This message has been forwarded.

I have attempted electronic filing but, alas, to no avail. Attached is my reply to the Order to Show Cause received this morning. A faxed copy will be sent and the hard copy via express mail.

Lewis Littlepage

This e-mail and any attachments contain information from the law firm of Littlepage & Associates, P.C. and are intended solely for the use of the named recipients or recipients. This e-mail may contain privileged attorney/client communications or work product. Any dissemination of this e-mail by anyone other than an intended recipient is strictly prohibited. If you are not the named recipient, you are prohibited from any further viewing of the e-mail or any attachments or from making any use of the e-mail or attachments. If you believe you have received this e-mail in error, notify the sender immediately and permanently delete the e-mail, any attachments, and all copies thereof from any drives or storage media and destroy any printouts of the e-mails or attachments



Reply OSC.doc

ATTACHMENT 2

Lewis Ward Littlepage
PO Box 2794
Wailuku, HI 96793
Tel: (808) 592-9473
E-Mail: lewis@littlepagelawfirm.com
Attorney for Ms. Shannon H. Seleen

**UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

SHANNON H. SELEEN,)	Civil Case No. 09-00010
)	
Plaintiff,)	REPLY TO ORDER TO SHOW CAUSE
)	
vs.)	
)	
GUAM PUBLIC SCHOOL SYSTEM,)	
GOVERNMENT OF GUAM,)	
)	
Defendant.)	

Comes now Lewis W. Littlepage and does submit this reply to the Order to Show Cause. Attorney Littlepage states that, prior to the Defendant's Motion to Dismiss, he had provided the Defendant and the Court with notice that his office would be closing. A copy of the Notice is attached as Exhibit 1. Attorney Littlepage expected to have better access to internet and research during the time he was moving but that expectation did not come to pass.

As a result of the move, Plaintiff's counsel lost internet and research capability far sooner than he expected. The client file in this case was improperly packed to be shipped rather than hand-carried. Plaintiff's counsel should have requested an extension from Defendant, who has been most gracious in these matters in the past, on the Motion to Dismiss but failed to do

so as a result of the necessity and pressures of a quick move. When Plaintiff finally regained internet access on September 10, 2009, Plaintiff contacted Defendant's counsel via e-mail and has forwarded on to him a proposed Scheduling Order and Discovery Plan.

Plaintiff's counsel requests that because of his move, which Defendant was aware of prior to filing his Motion to Dismiss, that Plaintiff be allowed until Friday, September 18, 2009, to file his Rely to the Motion to Dismiss. Defendant is not prejudiced by this delay and the case should be decided on the merits.

Plaintiff's counsel accepts responsibility and requests that any sanctions be directed at him and not at the Plaintiff as this is a matter of enforcing federal law.

Respectfully Submitted this 15th day of September, 2009.

Lewis W. Littlepage

LITTLEPAGE & ASSOCIATES, P.C.

396 W. O'Brien Drive
Chode Building
Hagåtña, Guam 96910

TELEPHONE: (671) 475-1111
TELECOPIER: (671) 475-1112
E-mail address: lewis@littlepagelawfirm.com

July 29, 2009

TO: JUSTICES, Supreme Court of Guam
JUDGES, Superior Court of Guam
CHIEF JUDGE, District Court of Guam
CLERK OF COURT, Supreme Court of Guam
CLERK OF COURT, Superior Court of Guam
CLERK OF COURT, District Court of Guam
ALL PRACTICING ATTORNEYS
Office of the Attorney General of Guam
Public Defender Service Corporation
Alternate Public Defender

RE: **Notice of Office Closing**

Please be advised that I have accepted a position at the Maui Prosecutor's Office and am closing my office as of August 14, 2009. From August 14, 2009 through August 25th, 2009 you may reach me at (671) 689-2310 or (671) 689-4939. Service may be arranged for any cases of which I am still counsel of record by telephoning me at one of the above numbers.

If any attorney is interested in leasing the office at 396 W. O'Brien Drive, inquiries can be made through this office.

After August 25th, I can be reached at the following address:

Lewis W. Littlepage
P.O. Box 2794
Wailuku, HI 96793-7794
E-Mail: guamlawyer@yahoo.com or lewis@littlepagelawfirm.com

Hawaii telephone and fax numbers will be provided as soon as available.
Thank you for your courtesy in this regard.

Sincerely,

Lewis W. Littlepage

BUSINESS ETC.

2020 MAIN STREET
WAILUKU, HI. 96793
808.242.8200 PHONE
808.242.8288 FAX

FAX COVER SHEET

U.S. DISTRICT COURT GUAM

TO: 671-473-9118 FROM: Lewis Littlepage

FAX: 671-473-9152 # OF PAGES: 4
(INCLUDING COVER SHEET)

PHONE: 671-472-2493 DATE:

RE: CC:

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY

☐ PER YOUR REQUEST

Initially provided by E-mail yesterday AFTER
E-filing Failed. A check of the file when
printing for fax showed file to be corrupt.
Resubmitted by fax with hard copy to file
via U.S. Express mail

RECEIVED
SEP 17 2009

DISTRICT COURT OF GUAM
HAGATNA, GUAM

ATTACHMENT 3

WAILUKU'S BUSINESS CENTER

Lewis Ward Littlepage
Po Box 2974
Wailuku, HI 96793
Tel: (808) 592-9473
E-Mail: lewis@littlepagelawfirm.com
Attorney for Ms. Shannon H. Seleen

**UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

SHANNON H. SELEEN,

Plaintiff,

vs.

GUAM PUBLIC SCHOOL SYSTEM,

GOVERNMENT OF GUAM,

Defendant.

Civil Case No. 09-00010

REPLY TO ORDER TO SHOW CAUSE

Comes now attorney Lewis W. Littlepage of Littlepage and does provide this Reply to the Order to Show Cause. Attorney Littlepage was moving. Prior to the Defendant filing his Motion to Dismiss, attorney Littlepage informed the Defendant and the Court that he would be moving and be unavailable for a period. A copy of the letter which was provided to the Defendant is attached as Exhibit 1. Attorney Littlepage expected to have better access to the internet and to research during his move that what actually occurred. As a result of the move, Plaintiff's file was improperly packed to be shipped on the container rather than hand-carried, a fact that was not discovered until arriving in Hawaii. With the closing of the office and the move, attorney Littlepage lost internet access and it was not reestablished in Hawaii until September 10,

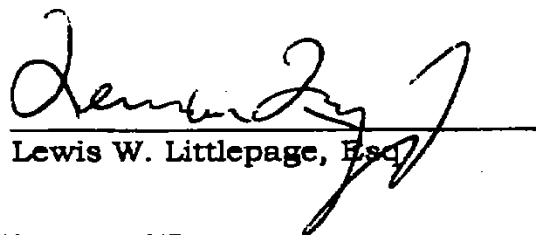
2009. When internet access was re-established, attorney Littlepage immediately provided a Scheduling and Discovery plan to the Defendant.

Because Defendant knew when it filed its Motion to Dismiss that Plaintiff was in the middle of a move and would not be able to respond timely, the Court should not unjustly sanction the Plaintiff. Any actions of the Court should be directed at this attorney who should have requested additional time for a response to the Motion to Dismiss based on his move but failed to do so because of the stress of the required quick move.

Attorney Littlepage requests that any sanctions of the Court be directed at him and not at the Plaintiff. This case is a matter of federal law and should be decided on the merits. Plaintiff requests until September 18, 2009 to respond to Defendant's Motion to Dismiss.

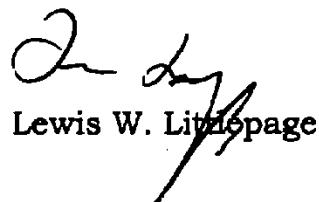
Respectfully submitted this 15th day of September, 2009.

By:


Lewis W. Littlepage, Esq.

CERTIFICATE OF SERVICE

Initially provided to the District Court by E-mail on September 15, 2009, after being unsuccessful at e-filing. Attempted to print copies for faxing and the file was corrupt. Document rewritten and now provide to the Guam District Court and the Guam Attorney General's Office via Fax with hard copy to follow by U.S. Express Mail.


Lewis W. Littlepage

LITTLEPAGE & ASSOCIATES, P.C.

396 W. O'Brien Drive
Chode Building
Hagåtña, Guam 96910

TELEPHONE: (671) 475-1111
TELECOPIER: (671) 475-1112
E-mail address: lewis@littlepagelawfirm.com

July 29, 2009

TO: JUSTICES, Supreme Court of Guam
JUDGES, Superior Court of Guam
CHIEF JUDGE, District Court of Guam
CLERK OF COURT, Supreme Court of Guam
CLERK OF COURT, Superior Court of Guam
CLERK OF COURT, District Court of Guam
ALL PRACTICING ATTORNEYS
Office of the Attorney General of Guam
Public Defender Service Corporation
Alternate Public Defender

RE: **Notice of Office Closing**

Please be advised that I have accepted a position at the Maui Prosecutor's Office and am closing my office as of August 14, 2009. From August 14, 2009 through August 25th, 2009 you may reach me at (671) 689-2310 or (671) 689-4939. Service may be arranged for any cases of which I am still counsel of record by telephoning me at one of the above numbers.

If any attorney is interested in leasing the office at 396 W. O'Brien Drive, inquiries can be made through this office.

After August 25th, I can be reached at the following address:

Lewis W. Littlepage
P.O. Box 2794
Wailuku, HI 96793-7794
E-Mail: guamlawyer@yahoo.com or lewis@littlepagelawfirm.com

Hawaii telephone and fax numbers will be provided as soon as available.
Thank you for your courtesy in this regard.

Sincerely,

Lewis W. Littlepage

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RECEIVED
SEP 18 2009

DISTRICT COURT OF GUAM
MAGATNA, GUAM

ATTACHMENT 4

Lewis Ward Littlepage
PO Box 2794
Wailuku, HI 96793
Tel: (808) 572-9473
E-Mail: lewis@littlepagelawfirm.com
Attorney for Ms. Shannon H. Seleen

**UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

SHANNON H. SELEEN,

Plaintiff,

vs.

**GUAM PUBLIC SCHOOL SYSTEM,
GOVERNMENT OF GUAM,**

Defendant.

) Civil Case No. 09-00010
)

) **PLAINTIFF'S REPLY TO**
) **DEFENDANT'S MOTION TO**
) **DISMISS FOR INSUFFICIENCY OF**
) **PROCESS AND SERVICE**
)
)
)

Rule 5(a)(1) of the Federal Rules of Civil Procedure states that service must be on the "party" unless the rules allow otherwise. Plaintiff complied with Rule 5(a)(1) and properly served the Defendant in this case. There is no exception in the Federal Rules for serving the Attorney General's Office when it is not known if that agency will be representing the Defendant. Only after it is made known to a party that an attorney is representing the opposing party may

1 service be made on the attorney. See Rule 5(b)(2) of the Federal Rules of Civil
2 Procedure.

3
4 In this case it was not known if the Guam Attorney General's Office
5 would be representing the Guam Public School System as the Guam Code
6 allows for the Guam Public School System to retain its own attorney.

7 **17 G.C.A. § 3109. Attorney for the Guam Public School**
8 **System.**

9 The Superintendent may employ an attorney(s) to assist and
10 represent it in all matters that concern the GPSS.

11 In addition, because Guam Code requires the Guam Attorney
12 General's Office to assist the Guam Public School System in all litigation
13 in which GPSS has an interest (17 G.C.A. § 3110), service on the Guam
14 Public School System automatically includes the Guam Attorney
15 General's Office. Defendant cannot claim he is without knowledge of the
16 Complaint. The Attorney General's Office and the Territory of Guam
17 have suffered no prejudice because it was served on the named party,
18 which the Guam Attorney General's Office is required to assist by
19 statute.
20

21 Defendant's arguments regarding service under the Guam Rules of
22 Civil Procedure are not applicable when service can be and was
23 accomplished as required in the Federal Rules of Civil Procedure.
24

25 Defendant cites to Rule 4(j)(2) of the Federal Rules of Civil Procedure.
26 This is not applicable as it deals with States and municipal corporations. Even
27 if it did apply, Plaintiff has complied because service on the Guam Public
28

1 School System automatically includes service upon the Guam Attorney
2 General's Office pursuant to 17 G.C.A. § 3110. Therefore Plaintiff properly
3 complied with the service on Defendant in this case.
4

5 Plaintiff respectfully requests that the Court deny the Plaintiff's Motion
6 and allow this case to proceed in a timely manner.
7

8 Respectfully submitted this 17th day of September, 2009.
9

10 LITTLEPAGE & ASSOCIATES, P.C.
11

12
13 By 
14 Lewis W. Littlepage, Esq.
15 Attorney for Ms. Shannon H. Seleen
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